

November 8, 2022

**Via ECF**

Honorable Lorna G. Schofield  
United States District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust  
Litigation*, Case No. 1:13-cv-07789-LGS

Dear Judge Schofield:

In accordance with the Court's October 25, 2022 Order (ECF No. 2018, the "Order"), we write jointly on behalf of the Plaintiffs and the Credit Suisse Defendants concerning the parties' motions to seal. Plaintiffs and Credit Suisse have conferred and attached hereto as Exhibits 1 to 53 please find materials that the parties believe should be filed in unredacted or less redacted form pursuant to the Order. These materials are described in Appendix A-1 (materials where the parties' sealing requests were denied) and Appendix A-2 (materials where the parties' sealing requests were granted but the materials were trial exhibits and the parties have filed the trial exhibits).

Pursuant to Rule I.D.3 of Your Honor's Individual Rules and Procedures for Civil Cases, Credit Suisse respectfully requests that ECF No. 1769-6, the Separation Agreement Between Peter Little and Barclays (the "Agreement") (Little\_FX\_000001) be filed under seal, as set forth in Appendix B. This Agreement, attached hereto as Exhibit 54, was not an exhibit at trial and contains information confidential to Mr. Little and Barclays, including information regarding separation payments and awards made to Mr. Little. Mr. Little is not a party to this action and the Agreement is specific to Mr. Little's relationship with Barclays. In such circumstances, filing under seal is appropriate. *See Iacovacci v. Brevet Holdings, LLC*, 2022 WL 101907, at \*2 (S.D.N.Y. Jan. 11, 2022) (maintaining a former employee's separation letter with a non-party under seal). Plaintiffs do not take a position regarding whether the Agreement should be sealed.

Further pursuant to Rule I.D.3 of Your Honor's Individual Rules and Procedures for Civil Cases, attached hereto as Appendix C is a list of all parties and attorneys of record who should have access to the sealed document.

-2-

Respectfully submitted,

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